

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

LEUPOLD & STEVENS, INC.,

Plaintiff / Counterclaim-Defendant,

v.

LIGHTFORCE USA, INC. d/b/a
NIGHTFORCE OPTICS and
NIGHTFORCE USA.

Defendant / Counterclaimant.

No. 3:16-cv-1570-HZ

**JOINT REPORT AND STIPULATION
TO DATES**

Pursuant to the Court's case management conference and rulings (Dkt # 74) on March 20, 2018, Plaintiff Leupold & Stevens, Inc. and Defendant Lightforce USA, Inc. d/b/a Nightforce Optics and Nightforce USA ("Lightforce"), by and through counsel of record, present this joint report setting forth the dates set by the Court and other intermediate deadlines stipulated to by the parties.

The parties submit this joint filing for ease of future reference on the Court docket.

<u>Event</u>	<u>Deadline</u>
Deadline to complete document productions (other than routine supplementation and/or newly discovered evidence, or evidence newly produced by a 3 rd party).	4/16/2018
Deadline for Counsel to Confer re Method and Timing of ADR Procedures and File Joint ADR Report	4/2/2018 (Dkt # 74)
Disclosure of Reliance Upon Advice of Counsel Defense	4/2/2018
Deadline to amend pleadings or add parties	4/20/2018

	(Dkt # 74)
Respond to all interrogatories, and requests for admission	5/25/2018
Date to complete fact depositions	7/6/2018
Deadline for fact discovery motions (if any)	7/13/2018
Opening expert reports as required by Fed. R. Civ. P. 26(a)(2)(A)-(C)	7/20/2018
Rebuttal expert reports as required by Fed. R. Civ. P. 26(a)(2)(D)(ii)	8/24/2018
Close of expert discovery	9/14/2018 (Dkt # 74)
Deadline to file dispositive motions	10/5/2018 (Dkt # 74)
ADR Deadline	11/16/2018
Summary Judgment Oral Arguments	12/17/2018 at 1:30 pm (Dkt # 74)
Deadline to file motions to exclude or limit expert testimony under <i>Daubert</i> or FRE 702-703	1/7/2019
Plaintiff to serve proposed pretrial order, jury instructions and verdict form	2/4/2019
Defendant to serve objections and counterproposals for proposed pretrial order, jury instructions and verdict form	2/15/2019
1st Wave of Pre-Trial Filings (exhibits and exhibit lists; lay and expert witness statements; itemized list of economic damages; deposition designations; trial briefs)	2/25/2019
2d Wave of Pre-Trial Filings (motions in limine; voir dire questions; jury instructions; verdict form; objections to witnesses; rebuttal witnesses/exhibits lists)	3/8/2019
3d Wave of Pre-Trial Filings (one-page list of all potential witnesses; rebuttal witness statements, deposition designations and exhibits; responses to motions in limine; objections to exhibits; objections to witnesses)	3/18/2019
Final Wave of Pre-Trial Filings (lodge proposed pretrial order, joint motion in limine ruling chart; joint witness and exhibit ruling chart; objections to rebuttal witness	3/29/2019

statements, deposition designations and exhibits)	
Final Pre-Trial Conference	April 8, 2019 at 9:00 am (Dkt # 74)
TRIAL	April 16, 2019 at 9:00 am (15 trial days) (Dkt # 74)

DATED this 21st day of March, 2018.

Respectfully submitted,

STOEL RIVES LLP

/s/ Kassim M. Ferris

Kassim M. Ferris, OSB No. 965260
Nathan C. Brunette, OSB No. 090913
760 S.W. Ninth Ave., Suite 3000
Portland, OR 97205
Telephone: (503) 224-3380
Facsimile: (503) 220-2480
kassim.ferris@stoel.com
nathan.brunette@stoel.com

Brian C. Park (*pro hac vice*)
600 University Street, Suite 3600
Seattle, WA 98101-4109
Telephone: (206) 386-7542
Facsimile: (206) 386-7500
brian.park@stoel.com

Attorneys for Plaintiff
LEUPOLD & STEVENS, INC.

KLARQUIST SPARKMAN, LLP

/s/ Scott E. Davis

Scott E. Davis, Esq., OSB No. 022883
One World Trade Center
121 SW Salmon Street, Suite 1600
Portland, OR 97204
scott.davis@klarquist.com
Todd M. Siegel, OSB No. 001049
todd.siegel@klarquist.com
(503) 473-0933

CASIMIR JONES, S.C.

David A. Casimir, Esq. (*pro hac vice* forthcoming)
2275 Deming Way, Suite 310
Middleton, WI 53562
dacasimir@casimirjones.com
(608) 662-1277

Attorneys for Defendant
LIGHTFORCE USA, INC.